

PFE/AJG July 2024
GJ #21

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ALABAMA
SOUTHERN DIVISION**

UNITED STATES OF AMERICA)
)
)
v.) No.
)
LOUIS TOLBERT,)
also known as "Lewis Mar'Keith Tolbert,")

INDICTMENT

COUNT ONE:
Possession of a Machinegun
[18 U.S.C. § 922(o)]

The Grand Jury charges that:

On or about the 25th day of April 2024, in Jefferson County, within the Northern District of Alabama, the defendant,

**LOUIS TOLBERT,
*also known as "Lewis Mar'Keith Tolbert,"***

did knowingly possess a machinegun, commonly known as a Glock Switch, a Glock-style machinegun conversion device, that is a combination of parts designed and intended for use in converting a weapon into a machinegun, in violation of Title 18, United States Code, Section 922(o).

COUNT TWO:
Possession of a Machinegun
[18 U.S.C. § 922(o)]

The Grand Jury charges that:

On or about the 6th day of May 2024, in Jefferson County, within the Northern District of Alabama, the defendant,

LOUIS TOLBERT,
also known as “Lewis Mar’Keith Tolbert,”

did knowingly possess a machinegun, that is, a Glock 9mm pistol modified with a machinegun conversion device designed to enable automatic fire, more commonly known as a “Glock switch,” in violation of Title 18, United States Code, Section 922(o).

COUNT THREE:
Prohibited Person in Possession of a Firearm
18 U.S.C. § 922(g)(1)

The Grand Jury charges that:

On or about the 6th day of May 2024, in Jefferson County, within the Northern District of Alabama, the defendant,

LOUIS TOLBERT,
also known as “Lewis Mar’Keith Tolbert,”

knowing he had been previously convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed a firearm, that is, a **Glock 9mm**

pistol, and the firearm was in and affecting interstate and foreign commerce, in violation of Title 18, United States Code, Section 922(g)(1). TOLBERT was previously convicted on August 26, 2010, in the Court of General Sessions in Greenwood County, South Carolina, of the offense of **Assault and Battery of a High and Aggravated Nature**, in case number 2010GS2400552, the said offense being a crime punishable by imprisonment for a term exceeding one year, in violation of Title 18, United States Code, Section 922(g)(1).

COUNT FOUR:
Possession of Unregistered Firearm
[26 U.S.C. § 5861(d)]

The Grand Jury further charges that:

On or about the 6th day of May 2024, in Jefferson County, within the Northern District of Alabama, the defendant,

LOUIS TOLBERT,
also known as “Lewis Mar’Keith Tolbert,”

knowingly received and possessed a firearm, that is, a Glock 9mm pistol modified with a machinegun conversion device designed to enable automatic fire, not registered to him in the National Firearms Registration and Transfer Record, in violation of Title 26, United States Code, Sections 5841, 5861(d) and 5871.

COUNT FIVE:
Possession of a Machinegun
[18 U.S.C. § 922(o)]

The Grand Jury charges that:

On or about the 12th day of June 2024, in Jefferson County, within the Northern District of Alabama, the defendant,

LOUIS TOLBERT,
also known as “Lewis Mar’Keith Tolbert,”

did knowingly possess a machinegun, that is, an Anderson Manufacturing AR-15 multicaliber pistol, chambered in 300 Blackout, modified with a machinegun conversion device designed to enable automatic fire, in violation of Title 18, United States Code, Section 922(o).

COUNT SIX:
Prohibited Person in Possession of a Firearm
18 U.S.C. § 922(g)(1)

The Grand Jury charges that:

On or about the 12th day of June 2024, in Jefferson County, within the Northern District of Alabama, the defendant,

LOUIS TOLBERT,
also known as “Lewis Mar’Keith Tolbert,”

knowing he had been previously convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed a firearm, that is, an **Anderson**

Manufacturing AR-15 multicaliber pistol, chambered in 300 Blackout, and the firearm was in and affecting interstate and foreign commerce, in violation of Title 18, United States Code, Section 922(g)(1). TOLBERT was previously convicted on August 26, 2010, in the Court of General Sessions in Greenwood County, South Carolina, of the offense of **Assault and Battery of a High and Aggravated Nature**, in case number 2010GS2400552, the said offense being a crime punishable by imprisonment for a term exceeding one year, in violation of Title 18, United States Code, Section 922(g)(1).

COUNT SEVEN:
Possession of Unregistered Firearm
[26 U.S.C. § 5861(d)]

The Grand Jury further charges that:

On or about the 12th day of June 2024, in Jefferson County, within the Northern District of Alabama, the defendant,

LOUIS TOLBERT,
also known as “Lewis Mar’Keith Tolbert,”

knowingly received and possessed a firearm, that is, an Anderson Manufacturing AR-15 multicaliber pistol, chambered in 300 Blackout, modified with a machinegun conversion device designed to enable automatic fire, not registered to him in the National Firearms Registration and Transfer Record, in violation of Title 26, United States Code, Sections 5841, 5861(d) and 5871.

NOTICE OF FORFEITURE
[18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c)]

1. The allegations contained in Counts One through Seven of this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeiture to the United States pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c).

2. Upon conviction of the offenses charged in Count One through Seven of this Indictment, the defendant, **LOUIS TOLBERT**, shall forfeit to the United States of America, pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c), all firearms, magazines, and ammunition involved in or used in the commission of the offense, including, but not limited to:

1. an **Anderson Manufacturing AR-15 multicaliber pistol**, chambered in 300 Blackout, bearing serial number 20250691.
2. and any associated magazines and ammunition.
3. a **Glock Model 19, 9mm pistol**, bearing serial number BXFT631.
4. and any associated magazines and ammunition.
5. Three machinegun conversion devices received from the defendant

LOUIS TOLBERT on April 25, 2024.

A TRUE BILL

/s/ electronic signature

FOREPERSON OF THE GRAND JURY

PRIM F. ESCALONA
United States Attorney

/s/ electronic signature

ALLISON J. GARNETT
Assistant United States Attorney